

I am writing to urge you to recertify New York State for Telecommunications Relay Services, with particular emphasis on Speech to Speech efforts. To comply with minimum standards NYS should include STS in its TRS Outreach and Education Projects. The specifics required in the Minimum Standard (47 C.F.R §64.604) are not appropriate outreach vehicles for reaching this population. STS outreach and educational programs should be appropriate to the needs of this population.

NYS should annually publish details of its planned STS outreach and education program and an appropriate budget. Effective STS outreach is now done in Washington State and Minnesota and described in the Texas STS Outreach RFP. Other states are encouraged to study that model. Prior to recertification I suggest that such a plan and budget be developed.

Regulation 47 C.F.R. § 64.604 - Mandatory minimum standards require under (3) that "Public access to information: Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. ... "

While I have seen publicity for and used Relay Service in NYS for hard of hearing individuals, I have not seen as much publicity, nor been involved with STS for those persons needing it. New York is a populated enough state that there must be many individuals who need and could be helped by such use, and by the publicity of its availability, and training of appropriate personnel to facilitate its use. Thank you for your consideration.

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